

"ANSWER"

Thomas and Company, a
body corporate

"

No. 13,771 Equity.

vs.

"

In the Circuit Court

Clarence A. Bussard,
Raymond H. Bussard and
Mary C. Wilhite

"

for Frederick County.

"

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Answer of Clarence A. Bussard to the Bill of Complaint filed against him in this cause, says:

FIRST: That he admits the matters and things stated in the first paragraph of said Bill of Complaint.

SECOND: Answering the second paragraph your respondent admits that the complainant is the owner of a piece of real estate situated on the north side of East South Street, it being the same real estate described in the deed mentioned therein, but denies that the deed of said complainant carries a right of way in the twenty-foot alley as shown on the Ramsburg plat.

THIRD: Answering the third paragraph your respondent admits that he alone is the owner of the parcel of land described in said paragraph, having purchased the remaining interests from his brother and sister, the three being devisees under the last Will and Testament of Joseph H. Bussard.

FOURTH: Answering the fourth paragraph your respondent admits that the Frederick City Manufacturing and Development Company did develop into building lots the property known as "Cannon Hill" as described on a plat recorded in Liber W. I. P. No. 13, folio 75, but that the plan of development of Cannon Hill was abandoned many years before the complainant acquired title to the parcel it now owns.

Further answering said paragraph your respondent says that the alleyway twenty feet wide running from the north side of South Street to the south side of All Saints Street was never dedicated to public use and has never been used by the public or by any of the adjoining owners except your respondent and his predecessors in title.